

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN MICHIGAN**

TRACY STEHLIN,

Plaintiff,

CASE NO. 21-cv-11135

v.

HON. SHALINA D. KUMAR

FCA US LLC,

MAG. JUDGE DAVID R GRAND

Defendant.

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S. RAE GROSS (P42514)
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DEFENDANT'S WITNESS LIST

Defendant, FCA US LLC ("FCA" or "Defendant"), by and through its counsel, Ogletree, Deakins, Nash, Smoak & Stewart, PLLC, submits the following list of lay and expert witnesses, pursuant to the Court's Rule 16 Scheduling Order (Phase 1) (ECF 13):

1. Tracy Stehlin, Plaintiff;
2. The following past and/or present servants, independent contractors, agents, records custodians, and/or employees of Defendant:

- a. Adrienne DiMambro
- b. Demetrius Williams
- c. Gilardo Rodriguez
- d. Karl Schloemp
- e. Joseph Boden
- f. Dorothy Williams
- g. Matthew J. Hamel
- h. Rolita Mansour

The individuals named above may be contacted through the undersigned counsel at 34977 Woodward Avenue, Suite 300, Birmingham, MI 48009, (248) 593-6400.

3. Abdul Nasser

4. Any and all witnesses identified by Plaintiff in this matter at her deposition yet to be taken, on her witness list, and in her responses to any interrogatories and requests for production of documents in this matter.

5. Any and all potential witnesses identified in discovery, including those identified in pleadings, subpoenas, FOIA requests, medical records, and/or depositions taken in this matter.

6. Any and all past, present, and future employees, servants, independent contractors, officers, directors, agents, and/or records custodians for any medical providers from whom Plaintiff has sought or received treatment, examination or evaluation.

7. All attending, treating, and/or examining physicians, psychologists, and healthcare professionals of Plaintiff.

8. Keepers of the Records for any and all past, present, and future employees, servants, independent contractors, officers, directors, agents, and/or records custodians for any employment, military, tax, or court documents obtained by Defendant through discovery, subpoena, FOIA request, or otherwise.

9. Any and all witnesses with information relating to Plaintiff's efforts to mitigate any alleged damages.

10. Any and all witnesses with information relating to any wages or income earned by Plaintiff during the time period relevant to this case.

11. Any and all medical, psychological/psychiatric, economic/damages, vocational rehabilitation, and/or data collections and forensic analysis experts Defendant deems necessary, including but not limited to Larry M. Friedberg, Ph.D., LLC, 31600 Telegraph Road, Suite 350, Bingham Farms, MI 48025; Edward Czarnecki, Ph.D., 26031 Concord Rd, Huntington Woods, MI 48070; and Michael

N. Kahaian, CPA/ABV, CFE, CFF, CVA, Accurity Group, LLC, 922 Highway 81 E., Suite 117, McDonough, GA 30252, or equivalent experts.

12. All experts needed to respond to experts named by Plaintiff.

13. Any other expert or individual whose identity becomes known and/or whose testimony Defendant deems relevant through further discovery.

14. Any and all witnesses necessary for foundation purposes in the entry of exhibits.

15. Any and all rebuttal or sur-rebuttal witnesses deemed necessary by Defendant.

Defendant reserves the right to add to, delete from, or otherwise amend this Witness List at any time, up to and including the time of the final pre-trial conference in this matter.

Dated: May 16, 2022

Respectfully submitted,

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, PLLC

/s/ S. Rae Gross

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CERTIFICATE OF SERVICE

The undersigned certifies and affirms that on May 16, 2022, she efiled with the Court Defendant's Witness List, using the Court's ECF system, which will serve an electronic copy of same to all ECF participants registered to receive notices in this matter.

/s/ S. Rae Gross

S. Rae Gross (P42514)

Attorney for Defendant FCA US LLC